

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

UNITED STATES OF AMERICA	§	
Plaintiff	§	
	§	
v.	§	No. 4:24-CV-00826
	§	
\$356,400 IN UNITED STATES	§	
CURRENCY, AND	§	
	§	
2018 CADILLAC ESCALADE, VIN	§	
1GYS4HKJ9JR339610	§	
Defendants	§	

VERIFIED COMPLAINT FOR FORFEITURE IN REM

In accordance with Fed. R. Civ. P. Supplemental Rule G(2), the United States of America, Plaintiff, brings this complaint and alleges as follows:

Nature of the Action

1. This is an action to forfeit property to the United States for violations of 18 U.S.C. § 1956 (Money Laundering).

Defendant In Rem

2. The Defendant Property is \$356,400.00 in United States currency and a 2018 Cadillac Escalade, VIN 1GYS4HKJ9JR339610, both seized from Zhao Chen at

1622 Singing Water Dr., Allen, Texas 75013, on January 17, 2023. The Defendant Property is currently in the possession of the United States Marshals Service.

Jurisdiction and Venue

3. The Court has subject matter jurisdiction over an action commenced by the United States pursuant to 28 U.S.C. § 1345, and over an action for forfeiture pursuant to 28 U.S.C. § 1355(a).

4. The Court has *in rem* jurisdiction over the Defendant Property pursuant to 28 U.S.C. § 1355(b)(1)(A) because acts or omissions giving rise to the forfeiture occurred in this district.

5. Venue is proper in this district pursuant to 28 U.S.C. § 1355(b)(1)(A) because acts or omissions giving rise to the forfeiture occurred in this district.

Basis for Forfeiture

6. The Defendant Property is subject to forfeiture pursuant to 18 U.S.C. § 981(a)(1)(A) because it is any property, real or personal, involved in a transaction or attempted transaction in violation of 18 U.S.C. § 1956, or any property traceable to such property.

Facts

7. The facts and circumstances supporting the forfeiture of the above-described property are attached in the affidavit by Special Agent Sean Reilly and summarized below:

a. In September 2022, law enforcement learned Zhao Chen (hereinafter, “Chen”) managing member of Trillion Technologies and Trading LLC, previously received illicit proceeds from drug dealing activity and was involved in a trade-based money laundering scheme. In this scheme, cell phones are purchased with bulk United States Currency (hereinafter, “USC”) which had previously been identified as drug proceeds. The purchases, frequently made by or on behalf of Mexican based cell phone distributors, involve the shipping of cell phones to United States/Mexico border cities. The cell phones are then suspected to be smuggled into Mexico, where they are sold and the drug proceeds are thereby recovered. As a result, companies like Trillion play an integral role in enabling drug trafficking organizations to operate within the United States and launder drug proceeds through legitimate companies.

b. It was believed that Chen used the 2018 Cadillac Escalade detailed above to transport and then store the proceeds of this scheme at his personal residence located at 1622 Singing Water Drive in Allen, Texas.

c. Law enforcement executed a search warrant at the Defendant Property and located cardboard boxes containing multiple bundles of United States currency valued at approximately \$356,400.00. The USC was bundled in small rubber bands with some containing small pieces of paper showing the amount of currency in the bundle.

d. Documentation at his Singing Water Dr. residence showed Chen claimed a salary of \$60,000 a year while making payments on the residence that is valued at

approximately \$800,000 and possessing high value vehicles such as a Tesla and the 2018 Cadillac Escalade.

e. Chen stated he was collecting the currency at his business from individuals delivering the currency on behalf of subjects in Mexico and would store the currency at until he could figure out what to do with it.

Potential Claimants

8. The known potential claimants to the Defendant Property are:

a. Zhao Chen - 1622 Singing Water Dr., Allen, Texas 75013,

b. Elizabeth Chen – c/o Joe Brown, 100 N. Travis St., Suite 205, Sherman, Texas 75090.

Claim for Relief

9. The United States respectfully requests that the Court forfeit the Defendant Property to the United States, award costs and disbursements in this action to the United States and order any other relief that the Court deems appropriate.

Respectfully submitted,

DAMIEN M. DIGGS
UNITED STATES ATTORNEY

/s/
Kevin McClendon

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CERTIFICATION OF FILING OF MOTION TO SEAL

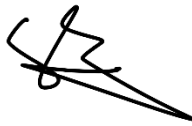
Pursuant to Local Rule CV-5(a)(7)(A), undersigned counsel certifies that on September 10, 2024, Plaintiff filed a Motion to Seal Affidavit Supporting the Complaint for Forfeiture In Rem. [Doc. #2]

VERIFICATION PURSUANT TO 28 U.S.C. § 1746

I, Sean Reilly, hereby state that:

1. I am a Special Agent with the Drug Enforcement Administration.
2. I have read this Complaint, and the information contained herein is true and correct to the best of my knowledge.
3. The information contained in this Complaint comes from the official files and records of the United States, statements from other law enforcement officers, and my investigation of this case.

I state and verify under penalty of perjury that the foregoing is true and correct.

A handwritten signature in black ink, appearing to be 'SR' with a long horizontal stroke extending to the right.

Sean Reilly
Special Agent
Drug Enforcement Administration